COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Investigation by the Department of Telecommunications and Energy on its own Motion into the Appropriate Pricing, based upon Total Element Long-Run Incremental Costs, for Unbundled Network Elements and Combinations of Unbundled Network Elements, and the Appropriate Avoided Cost Discount for Verizon New England, Inc. d/b/a Verizon Massachusetts' Resale Services in the Commonwealth of Massachusetts	D.T.E. 01-20

AT&T's FIFTH SET OF INFORMATION

REQUESTS TO VERIZON

AT&T Communications of New England, Inc. hereby submits to Verizon the following information requests. Please provide responses to these requests as they are completed.

Instructions

Each request should be answered on a separate page preceded by the request and by the name of the person responsible for the answer.

Please provide answers as they are completed.

These requests shall be deemed continuing so as to require supplemental responses if Verizon subsequently receives or becomes aware of additional information responsive to these requests.

If an answer refers to Verizon's response to another information request in this proceeding, please provide that response with the answer.

If Verizon cannot answer a request in full, answer to the extent possible and state why Verizon cannot answer the request in full.

If Verizon refuses to respond to any request by reason of a claim of privilege, state the privilege claimed and the facts relied upon to support the claim of privilege.

Unless otherwise stated, these requests concern Verizon's Massachusetts intrastate operations

The page number references in the following questions are to the hard copy of the testimony of Dinell Clark that was distributed by Verizon on May 8, 2001.

INFORMATION REQUESTS

1. Please provide the cost study supporting the Building Expense per Square Foot contained in the existing collocation tariff for Massachusetts. Alternatively, please provide a detailed list of inputs and/or factors that have caused the proposed Building Expense per Square Foot to be so much higher than the previous tariff value.

2. Referring to Part CA Exhibit Page 1 of 2, for Power Distribution, please provide the following information:

a) Please define the term "cable run" as used in the phrase "Per Cable Run Fused Up to 15 Amps."

b) Please define the number of cable runs that would be required for a Power Distribution arrangement up to 15 Amps.

c) Please define the number of cable runs that would be required for a Power Distribution arrangement up to 30 Amps.

d) Please define the number of cable runs that would be required for a Power Distribution arrangement up to 45 Amps.

e) Please define the number of cable runs that would be required for a Power Distribution arrangement up to 60 Amps.

f) Please define the number of cable runs that would be required for a Power Distribution arrangement up to 70 Amps.

g) Please define the number of cable runs that would be required for a Power Distribution arrangement up to 100 Amps.

h) Please define the number of cable runs that would be required for a Power Distribution arrangement up to 125 Amps.

i) Please define what the term "fused" refers to as it is used in the phrase "Per Cable Run Fused Up to 15 Amps." Also explain whether the term "fused" determines the limit on the size of fuse that Verizon will place in the Battery Distribution Fuse Bay for this particular arrangement or limits the amount of load that can be placed on this particular arrangement (fusing to be sized according to a maximum load).

j) If Verizon intends to interpret the term "fused" as limiting the size of fuse that Verizon will place in the Battery Distribution Fuse Bay for the particular arrangement, please

provide the general engineering requirements that Verizon used to determine the ratio load to fuse that Verizon permits on its DC power arrangements.

k) Please provide the written engineering guidelines (Bell System Practice or similar document) that Verizon uses to design DC Power Distribution for its own telecommunications equipment.

l) Please provide the DC voltage drop between the Battery Distribution Fuse Bay and the telecommunications equipment that Verizon used to develop the cable sizes incorporated in the DC Power Distribution costs for the power increments included in Verizon's cost study.

3. Referring to Part CA Exhibit Page 1 of 2, please provide the parameters that define how the Conduit rate element is applied consistent with Verizon's cost study. Also specify whether the Conduit charge that Verizon has developed is applicable on a per foot basis, per conduit basis, per duct basis, per sub-duct basis, or some other interval.

4. Referring to Part CA Exhibit Page 1 of 2 and Part CA Workpaper 5.0, please provide actual invoices for Verizon DC power plant installations in Massachusetts to support the following investment elements contained in Verizon's cost study (provide documentation for each of the Metro, Urban, Suburban and Rural zones):

a) Microprocessor Plant

b) Rectifiers

c) Batteries

d) Automatic Breaker

e) Power Distribution Service Cabinet

f) Emergency Engine

5. Referring to Part CA Exhibit Page 1 of 2 and to Part CA Workpaper 5.0, please provide supporting documentation for the capacities and quantities selected for each of the following components in each of the Metro, Urban, Suburban and Rural zones:

a) Microprocessor Plant

b) Rectifiers

c) Batteries

d) Automatic Breaker

e) Power Distribution Service Cabinet

f) Emergency Engine

6. Referring to Part CA Exhibit Page 1 of 2 and Part CA Workpaper 5.0, please provide supporting documentation to substantiate the power installation factor used in the DC Power Consumption cost study. Include actual invoices from vendors to substantiate the labor costs necessary to install each of the DC Power Plant components included in the Verizon cost study.

7. Referring to Part CA Exhibit Page 1 of 2 and Part CA Workpaper 5.0, please explain why the Digital Switching annual cost factors were used in developing the DC Power Consumption cost given the nature of the telecommunications equipment included in collocation arrangements. Please provide the accounting practice or other similar document that supports why this cost treatment is appropriate.

8. Please provide actual invoices for Verizon DC power plant installations in Massachusetts to support the Battery Distribution Fuse Bay investment included in Verizon's cost study.

9. Please provide the engineering guideline (Bell System Practice or similar document) that outlines how Verizon is to engineer the deployment of Battery Distribution Fuse Bays in its central offices. This should include, but not be limited to specifically noting the distance between the Battery Distribution Fuse Bays and the telecommunications equipment they serve.

10. Please explain how the Average Power Cable - Length was developed for the various gauges of DC power cable included in Part CA Workpaper 5.0, page 2 of 2.

11. Please provide supporting documentation - vendor invoices or the equivalent - documenting the power cable investment per foot reported by Verizon for each of the wire gauges included in the cost study.

12. Referring to Part CA Workpaper 5.0, page 2 of 2, please provide an explanation and supporting documentation for how the fuse grouping counts by distance were developed for the DC Power Distribution cost study.

13. Please provide a collocation pricing summary that details the nonrecurring and recurring costs by collocation rate element for a physical collocation arrangement with the following specifications:

- 300 Square Foot Collocation Cage

- 200 Amps (Load) of DC Power Consumption

- 200 Amps (Load) of DC Power Distribution

- 3,400 Voice Grade Circuits

- 280 DS1 Circuits

- 48 DS3 Circuits

- 1 Fiber Entrance Facility

If there are variables that Verizon believes are missing from this scenario, please provide the missing variables and specify the specific assumptions that Verizon has made. Please provide this pricing summary for the following three rate structures:

a) The existing Massachusetts State Collocation Tariff

b) The existing Massachusetts Federal FCC Collocation Tariff

c) The proposed pricing per Verizon's Cost Study Filing

Respectfully submitted,

AT&T COMMUNICATIONS OF NEW ENGLAND, INC.

By its attorneys,

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May 17, 2001

CERTIFICATE OF SERVICE

I hereby certify that I caused a true copy of the above document to be served upon the attorney of record for each other party by hand or mail on May 17, 2001.

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